

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JACOB ATKINSON, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

BURBERRY LIMITED, a foreign for profit
corporation doing business as BURBERRY;
and DOES 1 through 20,

Defendant.

Case No. 2:23-cv-01736-BJR

**STIPULATED MOTION FOR
EXTENSION OF TIME TO ANSWER
OR RESPOND TO COMPLAINT AND
DISCOVERY DEADLINES AND ORDER**

Plaintiff Jacob Atkinson and Defendant Burberry Limited (“Burberry”) respectfully, ask pursuant to Local Civil Rule 10(g), Local Civil Rule 7(d)(1), and this Court’s Standing Order, for the Court to extend the upcoming pleading and discovery deadlines by 30 days to enable the parties additional time to explore a potential resolution of this action. The parties are participating in discussions in an attempt to resolve this matter without engaging in unnecessary litigation. Most recently, the parties have exchanged drafts of CR 2A Agreement outlining a settlement structure that was discussed in several phone calls and email communications, and Burberry requires additional time to consider Plaintiff’s economic and non-economic terms, follow appropriate internal approval processes in order to propose a counteroffer, and further

engage Plaintiff in subsequent discussions about a potential resolution. Both parties thus stipulate as follows:

Burberry's time to answer or otherwise respond to Plaintiff's Complaint shall be extended by an additional 30 days from the current deadline of March 20, 2024 through and including April 19, 2024. To the extent Burberry files a dispositive motion in response to Plaintiff's Complaint, the parties agree to enter into a briefing schedule regarding same.

The deadline for the parties to participate in an initial conference pursuant to Federal Rule of Civil Procedure 26(f) shall be extended from March 22, 2024 through and including April 22, 2024.

The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) shall be extended from March 29, 2024 through and including April 29, 2024.

The deadline for the parties to submit a Joint Status Report shall be extended from April 5, 2024 through and including May 6, 2024.

Accordingly, both parties respectfully request that the Court find good cause to enter an order extending the upcoming pleading and discovery deadlines as set forth in this Stipulation and the proposed Order below.

IT IS SO STIPULATED by and between the parties.

DATED: March 22, 2024

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ORDER

PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED.

Defendant's time to answer or otherwise respond to Plaintiff's Complaint shall be extended through and including April 19, 2024.

The deadline for the parties to participate in an initial conference pursuant to Federal Rule of Civil Procedure 26(f) shall be extended through and including April 22, 2024.

The deadline for the parties to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) shall be extended through and including April 29, 2024.

The deadline for the parties to submit a Joint Status Report shall be extended through and including May 6, 2024.

DATED this 25th day of March 2024.



The Honorable Barbara J. Rothstein
United States District Judge